

district court of the united states
EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE

FILED

2024 JAN 11 PM 1:39

US DISTRICT COURT
EASTERN DIST. TENN.

Douglas Vernon, living man of the Mashek family)	
Claimant)	Civil Action No. <u>3:24-cv-10</u>
v.)	<u>Crytzel/McCook</u>
John Doe One , John Doe Two, John Doe Three)	
, Tow Truck Driver, Volunteer Towing, LLC)	Claim: Trespass by false arrest and
Donisha Russell, Keri Collins,)	imprisonment, barratry, theft of property.
Defendants)	

Serve: John Doe One
identity and address unknown

Serve: John Doe Two
identity and address unknown

Serve: John Doe Three
identity and address unknown

Serve: Tow Truck Driver
identity and address unknown

Serve: Volunteer Towing, LLC
5906 WALDEN DR. KNOXVILLE, TN 37919

Server: Donisha Russell
address unknown

Serve: Keri Collins
address unknown

PARTIES, JURISDICTION, AND VENUE

1. I, a living man; with the given name Douglas Vernon, of the Mashek family("Claimant"),
is a state Citizen of Wisconsin and sojourns upon the land of Tennessee.
2. Defendant John Doe One is believed to be a Resident of Tennessee.
3. Defendant John Doe Two is believed to be a Resident of Tennessee.

4. Defendant John Doe Three is believed to be a Resident of Tennessee.
5. Tow Truck Driver is believed be a Resident of Tennessee.
6. Defendant Volunteer Towing, LLC was a STATE OF TENNESSEE Corporation.
7. This Court has federal jurisdiction of this action based on the diversity of citizenship, and the amount of relief sought.
8. Venue is proper because substantial events which give rise to this Claim occurred on the land within the north, south, east, and west boundaries of this judicial district.

STATEMENT OF FACTS

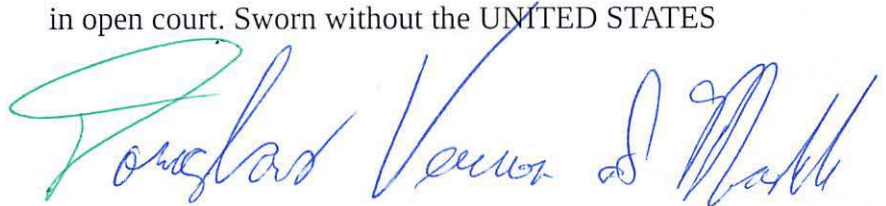
9. Claimant was arrested and imprisoned on 2022-01-09 to 2023-01-10 by John Doe One.
10. John Doe One claimed that the reason Claimant was arrested was because of his speech.
11. John Doe Two committed made false charges and affidavit of such against Claimant.
12. Claimant was searched, and his property was searched and seized without consent and against the wishes of claimant.
13. John Doe Two and John Doe Three assisted in the arrest and search and seizure of the property of Claimant.
14. Claimant claims that arrest and imprisonment was unlawful.
15. Claimant claims that the punishment for his speech was unlawful.
16. Claimant's Dodge Grand Caravan and Personal Property Contents were taken by Tow Truck Driver and delivered to City of Knoxville impound lot at 3407 Vice Mayor Jack Sharp Road.
17. Claimant claims that the searches and seizure of his body and his property were unlawful.
18. Donisha Russell refused to turn over Claimant's property to claimant without Claimant providing her without registration and other paperwork.
19. Keri Collins instructed Donisha Russell to withhold Claimant's property.

20. Claimant claims that the requirement of specific performance to release his property is unlawful conversion committed by Donisha Russell and Keri Collins.
21. The record shows the arrest, imprisonment, seizure of property and threat of continued imprisonment and holding of property. See Exhibit A.
22. Claimant claims that he harmed no one or their property and was exercising his rights.
23. Claimant claims no preexisting contract existed with the defendants, nor KNOXVILLE, nor COUNTY OF KNOX, nor KNOX COUNTY, nor STATE OF TENNESSEE.
24. Claimant claims that actions of defendants are outside their qualified immunity(if any).

DEMAND

For the unlawful taking and withholding of his liberty and property caused by Defendants, and for the punishment of his speech, Claimant requires an award of compensation in the sum of Three Hundred Fifty Thousand Dollars in addition with whatsoever compensation this court deems just. Claimant reserves the right to amend claim as new information is discovered.

I say all the above is true and correct to the best of my firsthand knowledge and will so affirm by testimony in open court. Sworn without the UNITED STATES



Douglas Vernon, a living man of the Mashek family

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